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Catalina Yachts, Inc.

FILED

JUL 14 1994

ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
HEARING CLERK

6 UNITED STATES  
7 ENVIRONMENTAL PROTECTION AGENCY  
8 REGION IX  
9 75 HAWTHORNE STREET  
10 SAN FRANCISCO, CA 94105

11 In the matter of: ) Docket No. EPCRA 09-94-0015  
12 CATALINA YACHTS, INC. ) ANSWER TO CIVIL COMPLAINT  
13 Respondent )  
14 \_\_\_\_\_ )

15 ANSWER

16 1. Answering Paragraphs 1-11 of the Complaint, Respondent  
17 Catalina Yachts, Inc. ("Respondent") admits that (i) it is a  
18 "person" as that term is defined by 42 U.S.C. § 11049(7);  
19 (ii) it is the "owner or operator" of its plant located at  
20 21200 Victory Boulevard, Woodland Hills, California; (iii) its  
21 Woodland Hills plant is a "facility" as that term is defined at  
22 42 U.S.C. § 11049(4); (iv) the Standard Industrial  
23 Classification ("SIC") Code for its Woodland Hills plant is  
24 3732; and (v) it employs more than 10 "full-time employees" as  
25 that term is defined at 40 C.F.R. § 372.3. Respondent is  
26 continuing to review its records and is at the present time  
27 unable to respond to the remaining allegations in Paragraphs  
28

1 1-11 of the Complaint and, therefore, denies each and every  
2 remaining allegation. Respondent reserves the right to amend  
3 its Answer when it completes its review.

4 COUNT I

5 2. Answering Paragraphs 12-16 of the Complaint,  
6 Respondent admits that it used acetone as a cleaning agent in  
7 its manufacturing operations during calendar year 1988.  
8 Respondent is continuing to review its records and is at the  
9 present time unable to respond to the remaining allegations in  
10 Paragraphs 12-16 of the Complaint and, therefore, denies each  
11 and every remaining allegation. Respondent reserves the right  
12 to amend its Answer when it completes its review.

13 COUNT II

14 3. Answering Paragraphs 17-21, Respondent admits that it  
15 used acetone as a cleaning agent in its manufacturing  
16 operations during calendar year 1989. Respondent is continuing  
17 to review its records and is at the present time unable to  
18 respond to the remaining allegations in Paragraphs 17-21 of the  
19 Complaint and, therefore, denies each and every remaining  
20 allegation. Respondent reserves the right to amend its Answer  
21 when it completes its review.

22 COUNT III

23 4. Answering Paragraphs 22-26 of the Complaint,  
24 Respondent admits that it processed products which contained  
25 styrene during calendar year 1988. Respondent is continuing to  
26 review its records and is at the present time unable to respond  
27 to the remaining allegations in Paragraphs 22-26 of the  
28

1 Complaint and, therefore, denies each and every remaining  
2 allegation. Respondent reserves the right to amend its Answer  
3 when it completes its review.

4  
5 COUNT IV

6 5. Answering Paragraphs 27-31 of the Complaint,  
7 Respondent admits that it processed products which contained  
8 styrene during calendar year 1989. Respondent is continuing to  
9 review its records and is at the present time unable to respond  
10 to the remaining allegations in Paragraphs 27-31 of the  
11 Complaint and, therefore, denies each and every remaining  
12 allegation. Respondent reserves the right to amend its Answer  
13 when it completes its review.

14 COUNT V

15 6. Answering Paragraphs 32-36 of the Complaint,  
16 Respondent admits that it processed products which contained  
17 styrene during calendar year 1990. Respondent is continuing to  
18 review its records and is at the present time unable to respond  
19 to the remaining allegations in Paragraphs 32-36 of the  
20 Complaint and, therefore, denies each and every remaining  
21 allegation. Respondent reserves the right to amend its Answer  
22 when it completes its review.

23 COUNT VI

24 7. Answering Paragraphs 37-42 of the Complaint,  
25 Respondent admits that it processed products which contained  
26 styrene during calendar year 1991. Respondent is continuing to  
27 review its records and is at the present time unable to respond  
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1 to the remaining allegations in Paragraphs 37-41 of the  
2 Complaint and, therefore, denies each and every remaining  
3 allegation. Respondent reserves the right to amend its Answer  
4 when it completes its review.

5 COUNT VII

6 8. Answering Paragraphs 42-46 of the Complaint,  
7 Respondent admits that it processed products which contained  
8 styrene during calendar year 1992. Respondent is continuing to  
9 review its records and is at the present time unable to respond  
10 to the remaining allegations in Paragraphs 42-46 of the  
11 Complaint and, therefore, denies each and every remaining  
12 allegation. Respondent reserves the right to amend its Answer  
13 when it completes its review.

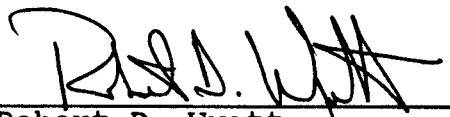
14 RELIEF REQUESTED

15 9. Respondent hereby requests a hearing to contest the  
16 allegations in the Complaint and the proposed penalties for the  
17 alleged violation.

18 DATED: July 14, 1994

BEVERIDGE & DIAMOND

20  
21 By:

  
Robert D. Wyatt  
Attorneys for  
CATALINA YACHTS, INC.

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